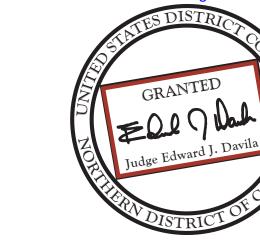
## Case 5:11-cv-00456-EJD Document 15 Filed 06/28/11 Page 1 of 2

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	



5/28/2011

Ryan Lee (SBN 235879) Krohn & Moss, Ltd. 10474 Santa Monica Blvd., Suite 401 Los Angeles, CA 90025 Tel: 323-988-2400 x241

Tel: 323-988-2400 x241 Fax: 866-583-3695

rlee@consumerlawcenter.com

Attorneys for Plaintiff, STACEY ORTEGA

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

STACEY ORTEGA,	) Case No.: 5:11-cv-00456-EJD
Plaintiff,	) ) PLAINTIFF'S REQUEST TO APPEAR ) TELEPHONICALLY AT CASE
VS.	) MANAGEMENT CONFERENCE RESET ) TO JULY 1, 2011
EDISON PATRICK & ASSOCIATES,	) 10 JULY 1, 2011 )
Defendant.	) ) )
	) )

Ryan Lee, counsel for Plaintiff, STACEY ORTEGA, respectfully requests this Honorable Court allow his telephonic appearance for the Case Management Conference hearing scheduled for July 1, 2011 at 10:00 AM.

Counsel's office is located in Los Angeles, California and appearing by telephone will avoid the significant time and resources needed to secure travel and appearance for the present hearing. Further, as the statues for which Plaintiff seeks relief under (FDCPA and RFDCPA) contains a "fee-shifting" provision, allowing Plaintiff to avoid the significant costs and expenses of securing travel from Los Angeles, CA to San Jose, CA will allow the parties to work towards a mutual resolution of the case without a significant increase in the Plaintiff's attorneys' fees and costs and thus making informal resolution more likely.

## **CERTIFICATE OF SERVICE BY MAIL**

I, Ryan Lee, an attorney, certify that I served a copy of Plaintiff's Request to Appear Telephonically to the Case Management Conference to the following address by FIRST CLASS MAIL:

Edison, Patrick & Associates 4446-1A HENDRICKS AVENUE SUITE 375 JACKSONVILLE FL 32207

Dated: June 24, 2011 \_\_/s/ Ryan Lee

19 Ryan Lee

21

20

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

22

23

24

25